

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION AT DAYTON**

<b>PAYSOURCE, INC., et al.</b>	:	Case No. 3:07 CV 0129
Plaintiffs,	:	(Judge Walter Herbert Rice)
v.	:	
<b>MIRABILIS VENTURES, INC., et al.</b>		:
Defendants.	:	

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**MOTION OF DEFENDANTS MIRABILIS VENTURES, INC., MIRABILIS HR, SPH, INC., COMMON PAY MASTERS, INC., AEM, INC., AARON BATES, YANIV AMAR, MARTY FLYNN, JAMES SADRIANNA AND JAY STOLLENWERK FOR AN EXTENSION OF TIME TO MOVE, PLEAD, OR OTHERWISE RESPOND TO THE PLAINTIFFS' COMPLAINT**

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\_\_\_\_ Pursuant to S.D. Ohio Civ. R. 6.1, Defendants Mirabilis Ventures, Inc., Mirabilis HR, SPH, Inc., Common Pay Masters, Inc., AEM, Inc., Aaron Bates, Yaniv Amar, Marty Flynn, James Sadrianna and Jay Stollenwerk (collectively referred to as "the Moving Defendants") respectfully move this Court for an Order extending the time within which they may respond to the Complaint of Plaintiffs Paysource, Inc. and Robert R. Sacco (collectively referred to as "Plaintiffs") until July 22, 2007. A Memorandum in support is attached hereto.

**MEMORANDUM**

\_\_\_\_ Counsel for the Moving Defendants was only recently contacted regarding representation and needs additional time in which to correspond with the Moving Defendants in order to prepare an adequate response to the Plaintiffs' Complaint. To date, other Defendants have not yet been served with the Plaintiffs' Complaint or have been served and not yet responded with certain responses due on July 11. Counsel for the Moving Defendants certifies that this Motion is not interposed for delay and that no prior requests for extension of time have been requested. Therefore, the Moving Defendants respectfully request that their Motion for Extension of Time to Move, Plead, or Otherwise Respond to Plaintiffs' Complaint be granted.

For the Court's convenience, a proposed Entry & Order granting the requested extension of time accompanies this Motion.

Respectfully submitted,

*/s/ Joseph C. Oehlers*

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AEM, Inc., Aaron Bates, Yaniv Amar, Marty Flynn,  
James Sadrianna and Jay Stollenwerk

**CERTIFICATE OF SERVICE**

This is to certify that on the **28th** day of **June, 2007**, a true and correct copy of the foregoing document was electronically filed with the Clerk of the Court using the CM/ECF system and that a true and correct copy of the foregoing document was electronically mailed such filing to the attorneys of record or parties from whom counsel has not appeared:

*Attorneys for Plaintiffs,* Brian Scott Sullivan, Esq., Seth A. Schwartz, Esq.  
and Timothy S. Mangan, Esq.

*Attorney for Defendant Michael Stanley:* Scott K. Jones, Esq.

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/s/ Joseph C. Oehlers  
Joseph C. Oehlers

And that on the 28th day of June, 2007, a true and correct copy of the foregoing was sent, via regular U.S. Mail, postage prepaid, to the following unrepresented Defendants listed in the Plaintiffs' Complaint:

Frank Amodeo  
614 Lake Avenue  
Orlando, FL 32801

Avant Services, Inc.  
156 Shinnecock Hill  
Avondale, PA 19311

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/s/ Joseph C. Oehlers  
Joseph C. Oehlers

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